

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix of
the ESTATE OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE,
LLC, KEY COMMERCIAL
FINANCE PROPERTIES, LLC,
EQUITY PROS, LLC, and MOBILE
AGENCY, LLC

Defendants.

No. 1:18-cv-01516-CFC

JUSTIN BILLINGSLEY and KEY
COMMERCIAL FINANCE, LLC,

Third-Party
Plaintiffs,

v.

DEBORAH S. SKEANS and DARBIN
SKEANS,

Third-Party
Defendants.

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure Plaintiff Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis moves for partial summary judgment against all named Defendants as to Counts I and V of the

Verified Complaint (D.I. 1).

The grounds for this motion are set forth in the accompanying Opening Brief in Support of Plaintiff's Motion for Partial Summary Judgment and Concise Statement of Material Facts in Support of Plaintiff's Motion for Partial Summary Judgment, filed contemporaneously with this motion.

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Estate of Frank E. Pavlis*

Dated: August 17, 2020